FREEHILL, HOGAN & MAHAR, LLP 80 Pine Street New York, NY 10005 (212) 425-1900 Patrick J. Bonner (PB3352)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THOMAS WILLOUGHBY

08 Civ. 4850 (LAK)

Plaintiff,

-against-

RULE 7.1 STATEMENT

KOSNAC FLOATING DERRICK CORP.

Defendant ----X

Defendant Kosnac Floating Derrick Corp. by and through its undersigned attorneys Freehill Hogan & Mahar, LLP, pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, undersigned counsel certifies that Defendant is not a publicly traded entities and no publicly held company owns 10% or more of their stock.

July 18, 2008

FREEHILL, HOGAN & MAHAR, LLP

Attorneys for Defendant

Koşnac Floating Derrick Corp.

By:

80 Pine/Street

New York, NY 10005

(212) 425 1900

Of Counsel:

Friedman, James & Buchsbaum LLP Attorneys for Plaintiff 132 Nassau Street Suite 900 New York, New York 10038